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Leonard Tucker, LLC*

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

LEONARD TUCKER, LLC, a Florida Limited
Liability Company,

Plaintiff/Counter-Defendant,

vs.

CLEAN VISION CORPORATION, f/k/a
BYZEN Digital, Inc., a Nevada Domestic
Corporation,

Defendant/Counter-Claimant

And All Related Claims.

Case No: 2:23-cv-00296-MGN-VCF

**STIPULATION AND ORDER TO
EXTEND STAY PENDING
ARBITRATION (SECOND REQUEST)**

Plaintiff/Counter-Defendants Leonard Tucker, LLC (“Tucker”) and Defendant/Counter-Plaintiff Clean Vision Corporation, f/k/a Byzen Digital, Inc. (“Clean Vision,” together with Tucker the “Parties”), through their respective counsel of record, hereby stipulate and agree as follows:

1. On January 30, 2023, Tucker filed a Complaint in the Second Judicial District Court of the State of Nevada, generally alleging that Clean Vision breached a certain Consulting Agreement dated December 14, 2020 (the “Agreement”). (ECF No. 1, Ex. A).
2. On February 24, 2023, Clean Vision filed a Notice of Removal in this Court, (ECF No. 1), and filed an Amended Notice of Removal on February 27, 2023. (ECF No. 6). Clean Vision’s removal documents allege, among other things, that “[r]emoval is proper

1 [b]ecause this Court has subject matter jurisdiction pursuant to 28 U.S.C. §§ 1332 and
2 1441(b).

- 3 3. On February 27, 2023, Clean Vision also filed its Answer, Jury Demand, Affirmative
4 Defenses, and Counterclaims against Leonard Tucker LLC and Leonard Tucker,
5 individually. (ECF No. 7). Clean Vision's Answer generally alleges, among other things,
6 that the Agreement is invalid and, alternatively, if the Agreement is valid, Tucker
7 breached the Agreement. (*Id.*)
- 8 4. On March 10, 2023, the Parties submitted a Stipulation and Order to Stay Case Pending
9 Arbitration, wherein the Parties requested "an Order from this Court staying this action
10 pending the outcome of the alternate dispute resolution proceedings . . . pursuant to the
11 Agreement" underlying the Parties' dispute. (ECF No. 12 ¶ 10). The Stipulation and
12 Order was granted, and this Court ordered that this Action would be stayed for a period
13 of 180 days. (*See* ECF No. 14).
- 14 5. This Court also entered a Minute Order on March 10, 2023, ordering that the parties shall
15 submit a Joint Status Report every ninety (90) days, beginning on June 8, 2023.
- 16 6. The Parties submitted a Joint Status Report on June 6, 2023, wherein the Parties informed
17 the Court that arbitration proceedings are scheduled to begin on October 30, 2023, in Las
18 Vegas, Nevada. (ECF No. 20 at 2).
- 19 7. The Parties participated in the Arbitration proceedings on October 20, 2024, in Las
20 Vegas, Nevada and are completing the briefing on remedies, which is expected to be fully
21 briefed by March 22, 2024.
- 22 8. The Parties thus request an Order from this Court extending the stay in this action for an
23 additional forty five (45) days pending the outcome of the arbitration.

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9. The instant request is made in good faith and not for purposes of delay.

DATED this 4th day of March, 2024.

MARQUIS AURBACH

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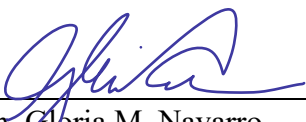
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ORDER

Based on the foregoing Stipulation, and good cause appearing, IT IS HEREBY ORDERED that the foregoing Stipulation is GRANTED. This action will be stayed for an additional forty five (45) days pending the outcome of the arbitration proceedings referred to in the Parties' Stipulation.

IT IS SO ORDERED.

DATED: March 4, 2024



Hon. Gloria M. Navarro
United States District Court
Judge